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September 29, 2021

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Request to Expand Page Limit in MDL 1358 / MTBE, *In Re: Methyl Tertiary Butyl Ether (“MTBE”) Products Liability Litigation*, No. 1:00-cv-01898-VSB

Dear Judge Broderick:

Defendants PJSC LUKOIL, LUKOIL Pan Americas, LLC, and LUKOIL North America LLC (collectively, the “Remaining LUKOIL Defendants”) respectfully request that this Court expand the word limit for the memorandum of law in support of their motions to dismiss to be filed on October 1, 2021. Rather than submit three separate memoranda in support of their motions, the Remaining LUKOIL Defendants are planning to submit one memorandum of law that addresses each of their separate arguments in support of their motions to dismiss. The Remaining LUKOIL Defendants have endeavored to be as concise as possible, but require pages in excess of the 25-page limit required by this Court’s Rule 4.B. Accordingly, the Remaining LUKOIL Defendants respectfully request leave to file a memorandum of law of no more than 40 pages.

The Commonwealth does not object to the Remaining LUKOIL Defendants’ request to exceed the Court’s page limit, so long as the Commonwealth is provided a reciprocal number of pages for its opposition to the Remaining LUKOIL Defendants’ consolidated motion. The Remaining LUKOIL Defendants consent to providing the Commonwealth a reciprocal number of pages for its opposition.

The Remaining LUKOIL Defendants and the Commonwealth have also conferred about a briefing schedule for the Remaining LUKOIL Defendants’ motions to dismiss and would propose that the Court adopt the following schedule:



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Remaining LUKOIL Defendants' Motion to Dismiss:	Friday, October 1, 2021
Commonwealth's Opposition:	Friday, January 14, 2022
Remaining LUKOIL Defendants' Reply:	Friday, February 18, 2022

Respectfully Submitted,

/s/ Joseph L. Sorkin